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11 UBER TECHNOLOGIES, INC.,
12 RASIER, LLC, and RASIER-CA, LLC

13 **UNITED STATES DISTRICT COURT**
14 **NORTHERN DISTRICT OF CALIFORNIA**
15 **SAN FRANCISCO DIVISION**

16
17 IN RE: UBER TECHNOLOGIES, INC.,
18 PASSENGER SEXUAL ASSAULT
LITIGATION

19 This Document Relates to:

20 *Jane Doe LS 37 v. Uber Technologies, Inc., et*
21 *al., No. 3:23-cv-04393-CRB*

22 *E.D. v. Uber Technologies, Inc., et al., No. 3:23-*
23 *cv-05307-CRB*

24 *Jane Doe LS 244 v. Uber Technologies, Inc., et*
25 *al., No. 3:23-cv-05372-CRB*

26 *H.L. v. Uber Technologies, Inc. et al., No. 3:24-*
27 *cv-04526-CRB*

28 *Jane Roe CL 12 v. Uber Technologies, Inc., et*
al., No. 3:24-cv-04673-CRB

Case No. 3:23-md-03084-CRB

**DECLARATION OF MICHAEL B.
SHORTNACY REGARDING
PLAINTIFFS NOT IN COMPLIANCE
WITH THE COURT'S
SEPTEMBER 16, 2025 ORDER
[ECF 3922]**

Judge: Hon. Charles R. Breyer
Courtroom: 6-17th Floor

1 *WHB 1293 v. Uber Technologies, Inc., et al.*,
No. 3:24-cv-04817-CRB

2 *WHB 1027 v. Uber Technologies, Inc., et al.*,
3 No. 3:24-cv-04820-CRB

4 *WHB 928 v. Uber Technologies, Inc., et al.*, No.
5 3:24-cv-04825-CRB

6 *WHB 511 v. Uber Technologies, Inc., et al.*, No.
7 3:24-cv-04842-CRB

8 *WHB 860 v. Uber Technologies, Inc., et al.*, No.
9 3:24-cv-04845-CRB

10 *WHB 1023 v. Uber Technologies, Inc., et al.*,
No. 3:24-cv-04877-CRB

11 *WHB 1002 v. Uber Technologies, Inc., et al.*,
12 No. 3:24-cv-04885-CRB

13 *WHB 1497 v. Uber Technologies, Inc., et al.*,
14 No. 3:24-cv-04891-CRB

15 *WHB 310 v. Uber Technologies, Inc., et al.*, No.
16 3:24-cv-04903-CRB

17 *WHB 333 v. Uber Technologies, Inc., et al.*, No.
18 3:24-cv-04905-CRB

19 *WHB 56 v. Uber Technologies, Inc., et al.*, No.
20 3:24-cv-04908-CRB

21 *WHB 312 v. Uber Technologies, Inc., et al.*, No.
22 3:24-cv-04928-CRB

23 *WHB 1590 v. Uber Technologies, Inc., et al.*,
24 No. 3:24-cv-04946-CRB

25 *WHB 1667 v. Uber Technologies, Inc., et al.*,
26 No. 3:24-cv-04957-CRB

27 *WHB 1960 v. Uber Technologies, Inc., et al.*,
28 No. 3:24-cv-04960-CRB

WHB 1619 v. Uber Technologies, Inc., et al.,
No. 3:24-cv-04961-CRB

1 *WHB 689 v. Uber Technologies, Inc., et al.*, No.
3:24-cv-04965-CRB

2 *WHB 676 v. Uber Technologies, Inc., et al.*, No.
3:24-cv-05024-CRB

4 *WHB 1837 v. Uber Technologies, Inc., et al.*,
5 No. 3:24-cv-05033-CRB

6 *WHB 1902 v. Uber Technologies, Inc., et al.*,
7 No. 3:24-cv-05040-CRB

8 *WHB 1431 v. Uber Technologies, Inc., et al.*,
9 No. 3:24-cv-05057-CRB

10 *WHB 666 v. Uber Technologies, Inc., et al.*, No.
3:24-cv-05127-CRB

11 *LS 523 v. Uber Technologies, Inc., et al.*, No.
12 3:24-cv-05155-CRB

13 *WHB 1394 v. Uber Technologies, Inc., et al.*,
14 No. 3:24-cv-05237-CRB

15 *WHB 466 v. Uber Technologies, Inc., et al.*, No.
3:24-cv-05265-CRB

16 *WHB 1832 v. Uber Technologies, Inc., et al.*,
17 No. 3:24-cv-05305-CRB

18 *WHB 645 v. Uber Technologies, Inc., et al.*, No.
19 3:24-cv-05356-CRB

20 *WHB 703 v. Uber Technologies, Inc., et al.*, No.
3:24-cv-05361-CRB

21 *WHB 1272 v. Uber Technologies, Inc., et al.*,
22 No. 3:24-cv-05366-CRB

23 *LS 529 v. Uber Technologies, Inc., et al.*, No.
24 3:24-cv-05422-CRB

25 *WHB 994 v. Uber Technologies, Inc., et al.*, No.
3:24-cv-05452-CRB

26 *WHB 1856 v. Uber Technologies, Inc., et al.*,
27 No. 3:24-cv-05461-CRB

1 *WHB 1021 v. Uber Technologies, Inc., et al.*,
No. 3:24-cv-05466-CRB

2 *WHB 1661 v. Uber Technologies, Inc., et al.*,
3 No. 3:24-cv-05468-CRB

4 *WHB 1414 v. Uber Technologies, Inc., et al.*,
5 No. 3:24-cv-05495-CRB

6 *WHB 1468 v. Uber Technologies, Inc., et al.*,
7 No. 3:24-cv-05500-CRB

8 *WHB 1043 v. Uber Technologies, Inc., et al.*,
9 No. 3:24-cv-05501-CRB

10 *CL 21 v. Uber Technologies, Inc., et al.*, No.
3:24-cv-05525-CRB

11 *LS 494 v. Uber Technologies, Inc., et al.*, No.
12 3:24-cv-05547-CRB

13 *WHB 1840 v. Uber Technologies, Inc., et al.*,
14 No. 3:24-cv-05554-CRB

15 *WHB 1677 v. Uber Technologies, Inc., et al.*,
16 No. 3:24-cv-05556-CRB

17 *WHB 1659 v. Uber Technologies, Inc., et al.*,
18 No. 3:24-cv-05565-CRB

19 *WHB 1618 v. Uber Technologies, Inc., et al.*,
20 No. 3:24-cv-05572-CRB

21 *Jane Roe CL 30 v. Uber Technologies, Inc., et*
22 *al.*, No. 3:24-cv-05591-CRB

23 *A.T. v. Uber Technologies, Inc., et al.*, No. 3:24-
24 cv-05592-CRB

25 *WHB 1943 v. Uber Technologies, Inc., et al.*,
26 No. 3:24-cv-05598-CRB

27 *WHB 1552 v. Uber Technologies, Inc., et al.*,
28 No. 3:24-cv-05599-CRB

WHB 1880 v. Uber Technologies, Inc., et al.,
No. 3:24-cv-05602-CRB

1 *WHB 1381 v. Uber Technologies, Inc., et al.*,
No. 3:24-cv-05603-CRB

2 *WHB 632 v. Uber Technologies, Inc., et al.*, No.
3:24-cv-05604-CRB

4 *WHB 1260 v. Uber Technologies, Inc., et al.*,
No. 3:24-cv-05613-CRB

6 *WHB 1544 v. Uber Technologies, Inc., et al.*,
No. 3:24-cv-05622-CRB

8 *WHB 438 v. Uber Technologies, Inc., et al.*, No.
3:24-cv-05631-CRB

10 *LS 248 v. Uber Technologies, Inc., et al.*, No.
3:24-cv-05647-CRB

12 *LS 514 v. Uber Technologies, Inc., et al.*, No.
3:24-cv-05658-CRB

14 *WHB 1611 v. Uber Technologies, Inc., et al.*,
No. 3:24-cv-05665-CRB

16 *WHB 891 v. Uber Technologies, Inc., et al.*, No.
3:24-cv-05666-CRB

18 *WHB 1348 v. Uber Technologies, Inc., et al.*,
No. 3:24-cv-05669-CRB

20 *WHB 946 v. Uber Technologies, Inc., et al.*, No.
3:24-cv-05698-CRB

22 *Jane Roe CL 35 v. Uber Technologies, Inc., et*
al., No. 3:24-cv-05706-CRB

24 *WHB 1142 v. Uber Technologies, Inc., et al.*,
No. 3:24-cv-05712-CRB

26 *WHB 1057 v. Uber Technologies, Inc., et al.*,
No. 3:24-cv-05715-CRB

28 *WHB 1470 v. Uber Technologies, Inc., et al.*, No.
3:24-cv-05716-CRB

Jane Roe CL 44 v. Uber Technologies, Inc., et al.,
No. 3:24-cv-05744-CRB

1 *WHB 494 v. Uber Technologies, Inc., et al.*, No.
3:24-cv-05767-CRB

2 *WHB 871 v. Uber Technologies, Inc., et al.*, No.
3:24-cv-05770-CRB

4 *WHB 935 v. Uber Technologies, Inc., et al.*, No.
3:24-cv-05776-CRB

5
6 *LS 455 v. Uber Technologies, Inc., et al.*, No. 3:24-
cv-05812-CRB

7 *CL 55 v. Uber Technologies, Inc., et al.*, No. 3:24-
8 cv-05835-CRB

9 *LS 363 v. Uber Technologies, Inc., et al.*, No. 3:24-
10 cv-05891-CRB

11 *LS 318 v. Uber Technologies, Inc., et al.*, No. 3:24-
cv-05932-CRB

12 *WHB 884 v. Uber Technologies, Inc., et al.*, No.
13 3:24-cv-05948-CRB

14 *WHB 991 v. Uber Technologies, Inc., et al.*, No.
15 3:24-cv-05959-CRB

16 *LS 207 v. Uber Technologies, Inc., et al.*, No. 3:24-
cv-05965-CRB

17 *DMA 1 v. Uber Technologies, Inc., et al.*, No. 3:24-
18 cv-05968-CRB

19 *LS 303 v. Uber Technologies, Inc., et al.*, No. 3:24-
20 cv-05980-CRB

21 *LS 125 v. Uber Technologies, Inc., et al.*, No. 3:24-
cv-05982-CRB

22 *WHB 1556 v. Uber Technologies, Inc., et al.*, No.
23 3:24-cv-05986-CRB

24 *LS 153 v. Uber Technologies, Inc., et al.*, No. 3:24-
cv-06011-CRB

25 *LS 216 v. Uber Technologies, Inc., et al.*, No. 3:24-
26 cv-06029-CRB

27 *LS 233 v. Uber Technologies, Inc., et al.*, No. 3:24-
28 cv-06030-CRB

1 *Jane Roe CL 73 v. Uber Technologies, Inc., et al.,*
No 3:24-cv-7030-CRB

2 *WHB 1999 v. Uber Technologies, Inc., et al., No.*
3 *3:24-cv-07048-CRB*

4 *B.B. v. Uber Technologies, Inc., et al., No. 3:24-cv-*
5 *07492-CRB*

6 *A.A. v. Uber Technologies, Inc., et al., No. 3:24-cv-*
7 *07549-CRB*

8 *E.R. 02 v. Uber Technologies, Inc., et al., No. 3:24-*
9 *cv-07635-CRB*

10 *E.H. v. Uber Technologies, Inc., et al., No. 3:24-cv-*
11 *08342-CRB*

12 *Jane Doe NLG (HK) v. Uber Technologies, Inc., et*
13 *al., No. 3:24-cv- 08614-CRB*

14 *S.G. v. Uber Technologies, Inc., et al., No. 3:24-cv-*
15 *08675-CRB*

16 *Dadej v. Uber Technologies, Inc., et al., No. 3:24-*
17 *cv-08785-CRB*

18 *C.B. v. Uber Technologies, Inc., et al., No. 3:24-cv-*
19 *09049-CRB*

20 *D.J. v. Uber Technologies, Inc., et al., No. 3:24-cv-*
21 *09050-CRB*

22 *E.B. v. Uber Technologies, Inc., et al., No. 3:24-cv-*
23 *09052-CRB*

24 *S.H. v. Uber Technologies, Inc., et al., No. 3:24-cv-*
25 *09068-CRB*

26 *CL 90 v. Uber Technologies, Inc., et al., No. 3:24-*
27 *cv-09201-CRB*

28 *Jane Doe NLG (R.M.) v. Uber Technologies, Inc., et*
al., No. 3:24-cv- 09216-CRB

D.C. 2636 v. Uber Technologies, Inc., et al., No.
3:24-cv-09367-CRB

Jane Doe 693827 v. Uber Technologies, Inc., et al.,
No. 3:24-cv-09515-CRB

1 *Jane Doe 691535 v. Uber Technologies, Inc., et al.*,
No. 3:24-cv-09523-CRB

2 *CL 94 v. Uber Technologies, Inc., et al.*, No. 3:24-
3 cv-09550-CRB

4 *CL 96 v. Uber Technologies, Inc., et al.*, No. 3:25-
5 cv-00463-CRB

6 *I.A. v. Uber Technologies, Inc., et al.*, No. 3:25-cv-
00822-CRB

7 *CL 99 v. Uber Technologies, Inc., et al.*, No. 3:25-
8 cv-00855-CRB

9 *L.F. v. Uber Technologies, Inc., et al.*, No. 3:25-cv-
10 01005-CRB

11 *WHB 2060 v. Uber Technologies, Inc., et al.*, No.
3:25-cv-01092-CRB

12 *WHB 2061 v. Uber Technologies, Inc., et al.*, No.
13 3:25-cv-01095-CRB

14 *WHB 2062 v. Uber Technologies, Inc., et al.*, No.
15 3:25-cv-01098-CRB

16 *WHB 2063 v. Uber Technologies, Inc., et al.*, No.
3:25-cv-01099-CRB

17 *WHB 2064 v. Uber Technologies, Inc., et al.*, No.
18 3:25-cv-01101-CRB

19 *WHB 2067 v. Uber Technologies, Inc., et al.*, No.
20 3:25-cv-01122-CRB

21 *WHB 2070 v. Uber Technologies, Inc., et al.*, No.
3:25-cv-01126-CRB

22 *WHB 2071 v. Uber Technologies, Inc., et al.*, No.
23 3:25-cv-01130-CRB

24 *WHB 2073 v. Uber Technologies, Inc., et al.*, No.
3:25-cv-01143-CRB

25 *WHB 2075 v. Uber Technologies, Inc., et al.*, No.
26 3:25-cv-01148-CRB

27 *WHB 2077 v. Uber Technologies, Inc., et al.*, No.
28 3:25-cv-01150-CRB

1 *WHB 2082 v. Uber Technologies, Inc., et al.*, No. 3:25-cv-01177-CRB

2 *WHB 2084 v. Uber Technologies, Inc., et al.*, No. 3:25-cv-01179-CRB

4 *WHB 2036 v. Uber Technologies, Inc., et al.*, No. 3:25-cv-01180-CRB

6 *WHB 2039 v. Uber Technologies, Inc., et al.*, No. 3:25-cv-01202-CRB

8 *WHB 2041 v. Uber Technologies, Inc., et al.*, No. 3:25-cv-01205-CRB

9 *WHB 2043 v. Uber Technologies, Inc., et al.*, No. 3:25-cv-01207-CRB

11 *WHB 2044 v. Uber Technologies, Inc., et al.*, No. 3:25-cv-01209-CRB

13 *WHB 2047 v. Uber Technologies, Inc., et al.*, No. 3:25-cv-01215-CRB

14 *WHB 2048 v. Uber Technologies, Inc., et al.*, No. 3:25-cv-01216-CRB

16 *WHB 2049 v. Uber Technologies, Inc., et al.*, No. 3:25-cv-01218-CRB

18 *WHB 2051 v. Uber Technologies, Inc., et al.*, No. 3:25-cv-01226-CRB

19 *WHB 2054 v. Uber Technologies, Inc., et al.*, No. 3:25-cv-01244-CRB

21 *WHB 2057 v. Uber Technologies, Inc., et al.*, No. 3:25-cv-01249-CRB

23 *WHB 2059 v. Uber Technologies, Inc., et al.*, No. 3:25-cv-01255-CRB

24 *S.G. v. Uber Technologies, Inc., et al.*, No. 3:25-cv-01417-CRB

26 *K.D. v. Uber Technologies, Inc., et al.*, No. 3:25-cv-01602-CRB

28 *T.K. v. Uber Technologies, Inc., et al.*, No. 3:25-cv-01651-CRB

1 *S.W. v. Uber Technologies, Inc., et al.*, No. 3:25-cv-
01658-CRB

2 *C.C. v. Uber Technologies, Inc., et al.*, No. 3:25-cv-
3 01707-CRB

4 *M.S. v. Uber Technologies, Inc., et al.*, No. 3:25-cv-
5 01863-CRB

6 *Halligan v. Uber Technologies, Inc., et al.*, No. 3:25-
cv-02104-CRB

7 *T.C. v. Uber Technologies, Inc., et al.*, No. 3:25-cv-
8 02109-CRB

9 *Jane Doe LS 578 v. Uber Technologies, Inc., et al.*,
10 No. 3:25-cv-02405-CRB

11 *CL 129 v. Uber Technologies, Inc., et al.*, No. 3:25-
cv-02498-CRB

12 *A.M. v. Uber Technologies, Inc., et al.*, No. 3:25-cv-
13 02510-CRB

14 *J.H. v. Uber Technologies, Inc., et al.*, No. 3:25-cv-
15 02526-CRB

16 *A.J. v. Uber Technologies, Inc., et al.*, No. 3:25-cv-
02577-CRB

17 *Jane Doe NLG (KS) v. Uber Technologies, Inc., et*
18 *al.*, No. 3:25-cv- 02616-CRB

19 *K.B. v. Uber Technologies, Inc., et al.*, No. 3:25-cv-
20 02650-CRB

21 *N.K. v. Uber Technologies, Inc., et al.*, No. 3:25-cv-
02681-CRB

22 *J.M., v. Uber Technologies, Inc., et al.*, No. 3:25-cv-
23 02689-CRB

24 *T.M. v. Uber Technologies, Inc., et al.*, No. 3:25-cv-
02704-CRB

25 *S.F. v. Uber Technologies, Inc., et al.,*, No. 3:25-cv-
26 02708-CRB

27 *CL 132 v. Uber Technologies, Inc., et al.*, No. 3:25-
28 cv-02744-CRB

1 *NLG (IM) v. Uber Technologies, Inc., et al.*, No.
3:25-cv-02771-CRB

2 *M.H. v. Uber Technologies, Inc., et al.*, No. 3:25-
3 cv-02859-CRB

4 *K.T. v. Uber Technologies, Inc., et al.*, No. 3:25-cv-
5 02880-CRB

6 *T.P. v. Uber Technologies, Inc., et al.*, No. 3:25-cv-
03016-CRB

7 *CL 143 v. Uber Technologies, Inc., et al.*, No. 3:25-
8 cv-03260-CRB

9 *CL 145 v. Uber Technologies, Inc., et al.*, No. 3:25-
10 cv-03262-CRB

11 *J.P.F. v. Uber Technologies, Inc., et al.*, No. 3:25-
cv-03289-CRB

12 *J.M. v. Uber Technologies, Inc., et al.*, No. 3:25-cv-
13 03364-CRB

14 *Batterson, Vanessa v. Uber Technologies, Inc., et al.*,
No. 3:25-cv- 03378-CRB

15 *V.M. v. Uber Technologies, Inc., et al.*, No. 3:25-cv-
16 03591-CRB

17 *CL 153 v. Uber Technologies, Inc., et al.*, No. 3:25-
18 cv-03818-CRB

19 *Crystal Lugo v. Uber Technologies, Inc., et al.*, No.
3:25-cv-03969-CRB

20 *Breanna Donaldson v. Uber Technologies, Inc., et*
21 *al.*, No. 3:25-cv- 03976-CRB

22 *C.E. v. Uber Technologies, Inc., et al.*, No. 3:25-cv-
23 04100-CRB

24 *S.S. v. Uber Technologies, Inc., et al.*, No. 3:25-cv-
04143-CRB

25 *W.M. v. Uber Technologies, Inc., et al.*, No. 3:25-cv-
26 04717-CRB

27 *K.N. v. Uber Technologies, Inc., et al.*, No. 3:25-cv-
28 04719-CRB

1 *R.H. v. Uber Technologies, Inc., et al.*, No. 3:25-cv-
04725-CRB

2 *T.P. v. Uber Technologies, Inc., et al.*, No. 3:25-cv-
3 04766-CRB

4 *V.R. v. Uber Technologies, Inc., et al.*, No. 3:25-cv-
5 04767-CRB

6 *S.K. v. Uber Technologies, Inc., et al.*, No. 3:25-cv-
04768-CRB

7 *L.K. v. Uber Technologies, Inc., et al.*, No. 3:25-cv-
8 04774-CRB

9 *B.W. v. Uber Technologies, Inc., et al.*, No. 3:25-cv-
10 04796-CRB

11 *G.G. v. Uber Technologies, Inc., et al.*, No. 3:25-cv-
04798-CRB

12 *D.C. v. Uber Technologies, Inc., et al.*, No. 3:25-cv-
13 04851-CRB

DECLARATION OF MICHAEL B. SHORTNACY

I, Michael B. Shortnacy, declare pursuant to 28 U.S.C. § 1746:

1. I am over the age of 18 and am a resident of Los Angeles, CA. I respectfully submit this declaration identifying the plaintiffs that are not in compliance with the Court's September 16, 2025 Order [ECF 3922].

2. I am a partner at the law firm of Shook, Hardy & Bacon L.L.P., attorneys of record for Defendants Uber Technologies, Inc., Rasier, LLC, and Rasier-CA, LLC, (collectively, "Defendants"). I am a member in good standing of the Bar of the State of California, the Bar of the State of New York, and the Bar of the District of Columbia. I know the following facts to be true of my own knowledge, and if called to testify, I could competently do so.

3. On September 16, 2025, the Court ordered each Plaintiff subject to Uber's Motion to Dismiss Cases for Failure to Comply with PTO 10 to provide a substantially complete and verified Plaintiff Fact Sheet within 14 days of the Order. The Order therefore compelled compliance by each Plaintiff subject to the Order by September 30, 2025.

4. The Court also ordered counsel for Defendants to submit a declaration within 21 days of the Order (*i.e.*, by October 7, 2025), identifying which, if any, Plaintiffs did not comply with the Court's Order.

5. Counsel for Defendants has reviewed all submissions to MDL Centrality by the Plaintiffs subject to the Court's September 16, 2025 Order to determine whether each Plaintiff has submitted a substantially complete and verified Plaintiff Fact Sheet as ordered by the Court. [ECF 3922.]

6. Based on counsel for Defendants' review of all submissions to MDL Centrality by the Plaintiffs subject to the Court's September 16, 2025 Order, as of October 6, 2025, the Plaintiffs identified in the table attached to this declaration as **Exhibit A** have failed to submit a substantially complete and verified Plaintiff Fact Sheet as ordered by the Court.

I declare under penalty of perjury that the foregoing is true and correct.

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Executed on October 6, 2025, in Los Angeles, California.

/s/Michael B. Shortnacy
Michael B. Shortnacy